

**VIA EMAIL & FEDERAL EXPRESS**

August 30, 2010

Ms. Kimberly Staiger  
On-Scene Coordinator  
Removal Action Branch and the Remedial  
Response Division  
U.S. Environmental Protection Agency Region II  
2890 Woodbridge Ave. Bldg 209 (MS-211)  
Edison, NJ 08837-3679

**Re: Updated Project Schedule For Closure Of Building Openings  
Administrative Settlement Agreement & Order on Consent  
Index # CERCLA 02-2010-2012  
Standard Chlorine Chemical Company Superfund Site  
Kearny, New Jersey**

Dear Ms. Staiger:

On behalf of the Respondents [Standard Chlorine Chemical Company, Inc. (SCCC) and Beazer East Inc. (Beazer)], Key Environmental (KEY) hereby submits for your review an updated project schedule for implementation of the construction work identified in the "Closure of Building Openings, Northeastern Buildings at the Standard Chlorine Chemical Company Superfund Site located in Kearny, New Jersey" (Work Plan). This updated schedule is submitted in accordance with Paragraph 70 of the Administrative Settlement Agreement. & Order on Consent for Removal Action, Index # CERCLA 02-2010-2012 (Order).

As we have discussed, the initiation of construction activities has been delayed as a result of union labor issues. The Respondents had arrangements made with Chemtron Corporation of Avon Lakes, Ohio to perform the work with non-union labor. Chemtron has expertise with this work, assisted KEY with development of the Work Plan and has a services agreement in place with the Respondents. As you may be aware, the Peninsula Restoration Group (Group), which is comprised of SCCC, Beazer and Tierra Solutions, Inc., recently initiated the implementation of an interim response action at the SCCC Site and adjacent Diamond Site. The interim response action is being performed using union labor. The Group was advised by the contractor performing the interim response action that it should not attempt to complete the removal action using non-union labor while its union workers are present on the Site. On this advice, KEY, on behalf of the Respondents, solicited bids from other qualified contractors who possess the necessary agreements with the appropriate labor unions to implement the project using union labor.

The Respondents have selected Nova Development Group, Inc. (Nova) of New Brunswick, New Jersey to implement the construction work required by the Removal Order, subject to EPA

approval of this selection. KEY will be providing field supervision of Nova's work on behalf of the Respondents. KEY will be forwarding to you in a separate submittal the qualifications information for Nova as required by Paragraph 39 of the Order.

As shown on the Project Schedule, work is scheduled to begin on Monday September 13, 2010. We are planning to hold a Health and Safety kick-off meeting at the Site beginning at 11:00 a.m. on Thursday September 9, 2010. Please note that the Respondents are not requesting an extension to the overall schedule presented in the approved work plan. Barring any unforeseen delays with implementation of the construction activities, the Respondents and KEY believe that submittal of a Final Report on or before November 18, 2010, as shown on the work plan schedule, is currently feasible.

I will contact you in advance of the Health and Safety meeting to confirm the meeting schedule and provide details regarding the exact location of the meeting at the Site. If you have any questions regarding the attached schedule, please feel free to contact me at (412) 428-9387.

Sincerely,



James S. Zubrow  
Project Coordinator

cc: A. Hess – EPA - (hard copy, electronic copy)  
S. Flanagan – EPA (electronic copy)  
C. Kanakis – (hard copy)  
M. Kelly – SCCC (electronic copy)  
T. Grant – Nova (electronic copy)  
M. Brouman – Beazer - (electronic copy)  
C. McChesney – Beazer - (electronic copy)  
G. Coscia – Langan (electronic copy)

FIGURE 4  
PROJECT SCHEDULE  
WORK PLAN FOR CLOSURE OF BUILDING OPENINGS  
STANDARD CHLORINE CHEMICAL CO. SITE  
KEARNY, NEW JERSEY

